



Littler Mendelson P.C.
290 Broadhollow Road
Suite 305
Melville, NY 11747

Daniel Gomez-Sanchez
631.247.4713 direct
631.247.4700

May 26, 2022

VIA ECF

Honorable Philip M. Halpern
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Application granted. The time for defendant to respond to the complaint is extended to 6/27/2022.

SO ORDERED.

A handwritten signature in black ink, appearing to read "PHM", written over a horizontal line.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
May 27, 2022

Re: *Martinez v. Trego/Dugan Aviation of Grand Island, Inc.*
Case No.: 7:22-CV-03383 (PMH)

Dear Judge Halpern:

We represent Trego/Dugan Aviation of Grand Island, Inc. ("Defendant") in the above-referenced action. We write jointly with Plaintiff to respectfully request a 30-day extension of time to respond to the Complaint.

On May 18, 2022, Defendant wrote to Plaintiff pursuant to Rule 4(C)(ii) of Your Honor's Individual Practices in Civil Cases, arguing, among other things, that there was an insufficient amount in controversy for subject matter jurisdiction in this case.

On May 24, 2022, Plaintiff served his response to Defendant's May 18 letter. In his response letter, Plaintiff requested, among other things, documentary evidence from Defendant supporting its contention regarding the amount in controversy.

For these reasons, the parties require additional time to exchange information in order to determine whether the matter should be voluntarily dismissed or if motion practice is necessary. This is Defendant's first request for an extension of time to respond to the Complaint.

Honorable Philip M. Halpern
May 25, 2022
Page 2

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Daniel Gomez-Sanchez

Daniel Gomez-Sanchez
Matthew R. Capobianco

cc: Bursor & Fisher, P.A.
Yitzchak Kopel, Esq.

4858-2684-9826.1 / 111662-1007